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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 JOHN ILIESCU, JR, and SONNIA ILIESCU,
9 Trustees of The John Iliescu, Jr. and Sonnia Iliescu
1992 Family Trust Agreement, dated January 24,
1992,

10 Plaintiffs,

11 vs.

12 THE REGIONAL TRANSPORTATION
13 COMMISSION OF WASHOE COUNTY, a
14 special unit of the government; and DOES I
through X, inclusive,

15 Defendants.

16 Case No. 3:21 – CV-000387-ART-CLB

17 **ORDER APPROVING**

18 **STIPULATION TO EXTEND
19 PLAINTIFF'S TIME TO RESPOND
20 TO MOTION FOR PARTIAL
21 SUMMARY JUDGMENT FILED BY
22 DEFENDANT**

23 **[FIRST REQUEST]**

24 Under Fed. R. Civ. P. (“FRCP”) 6 and this Court’s Local Rules (“LR”) of Practice LR IA 6-1,
25 Plaintiffs, JOHN ILIESCU, JR, and SONNIA ILIESCU, Trustees of The John Iliescu, Jr. and Sonnia
26 Iliescu 1992 Family Trust Agreement, dated January 24, 1992, by and through their attorneys, Donald
A. Lattin, Esq. and Carolyn K. Renner, Esq., of the MAUPIN, COX & LEGOY law firm and
Defendant, THE REGIONAL TRANSPORTATION COMMISSION OF WASHOE COUNTY, by
and through its attorney, Dane Anderson, Esq., of the WOODBURN & WEDGE law firm, stipulate,
subject to this Court’s approval, to extend the deadline by which Plaintiffs must file their Opposition
 (“Opposition”) to the Motion for Partial Summary Judgment filed by Defendant [ECF No. 33]. In
support of this Stipulation, the Parties state:

27 1. Defendant filed its Motion for Partial Summary Judgment [ECF No. 33] on August 12,
28 2022.

1 2. Plaintiffs' deadline to file the Opposition is September 2, 2022.

2 3. Counsel for the parties met and conferred regarding LR 56-1 pertaining to motions for
3 summary judgment and the requirement to that a motion include a "concise statement setting forth
4 each fact material to the disposition of the motion that they party claims is or is not genuinely in issue
5 ..." .

6 4. Defendant has agreed to file a statement of undisputed facts as a supplement to its
7 Motion for Partial Summary Judgment.

8 5. Plaintiffs shall have 14 days from the date Defendant files its statement of undisputed
9 facts within which to file its Opposition to the Motion for Partial Summary Judgment.

10 6. Accordingly, the Parties agree that good cause exists to support this request for an
11 extension of time within which Plaintiffs may file its Opposition to the Motion for Partial Summary
12 Judgment.

13 WHEREFORE, the parties respectfully request this Court approve this Stipulation.

14 Respectfully, submitted this 31st day of August, 2022.

15 /s/ Dane Anderson

16 Dane Anderson, Esq. (NV SBN 6883)
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18 *Attorneys for Defendant*

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dlattin@mcllawfirm.com
23 crenner@mcllawfirm.com
24 *Attorneys for Plaintiffs*

25 IT IS SO ORDERED.

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28 DATED: September 1, 2022
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